

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA**

Case No. 1:22-cv-24066-KMM

GRACE, INC., *et al.*,

*Plaintiffs,*

v.

CITY OF MIAMI,

*Defendant.*

\_\_\_\_\_ /

**PLAINTIFFS' NOTICE OF SUPPLEMENTAL AUTHORITY**

Pursuant to Local Rule 7.8, Plaintiffs give notice of the following supplemental authority:

*Common Cause, Fla. v. Byrd*, No. 4:22-cv-109-AW-MAF, 2024 WL 1308119, at \*39–42, 45–47 (N.D. Fla. Mar. 27, 2024) (three-judge court) (per curiam).

The decision is the district court's findings of fact and conclusions of law in a challenge to Florida's congressional map under a different Fourteenth Amendment theory. But pertinent to this case, the decision (1) applies the one plaintiff standing rule in a decision on the merits and (2) finds that a membership organization can establish standing to challenge electoral districts with similar evidence as in this case, including when the organization keeps confidential the details of its membership information.

The decision supports Plaintiffs' Proposed Findings of Fact and Conclusions of Law (ECF No. 181) ¶¶ 7, 26–28.

Respectfully submitted March 29, 2024,

/s/ Nicholas L.V. Warren

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